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MEMO ENDORSED

April 9, 2021

By ECF

Judge Kenneth M. Karas
United States District Judge
United States District Court
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Re: Danielle Warren v. Ultimate Fitness Group, LLC, et al.
Case No: 19-cv-10315 (KMK)

Dear Judge Karas:

We are counsel to Plaintiff Danielle Warren in the above-referenced matter. In accordance with the Court's motion schedule, we are filing today Plaintiff's application and supporting papers to amend the complaint in the above-referenced matter. Pursuant to Magistrate Judge McCarthy's October 15, 2020 signed Stipulated Protective Order ("SPO") (Doc. 40), as the motion contains information and documents covered under the SPO, the motion papers are being filed under seal.

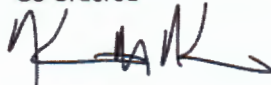
Alternatively, if necessary, in addition to the SPO, Plaintiff respectfully requests Court permission to file the motion papers under seal, as provided for under Section 6 of the Southern District of New York's Electronic Case Filing Rules & Instructions, with viewing access restricted to the Parties, including all attorneys appearing for the parties and court personnel.

Thank you for your consideration in this matter and please contact us if you have any questions.

Plaintiff is to publicly file a redacted version of the motion papers by 4/23/21.

Respectfully submitted,

So Ordered



4/9/21

/s/ William J. Sipser

William J. Sipser (WS1781)

cc. George P. Barbatsuly, Esq.
Attorney for the Florida Defendants (by ECF)
Michael Billok, Esq., Bond, Schoeneck and King, PLLC
Attorney for the New York Defendants (by ECF)